

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a  
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR  
INTERNATIONAL, INC., a Delaware  
corporation, and FAIRCHILD  
SEMICONDUCTOR CORPORATION, a  
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

**POWER INTEGRATIONS' [PROPOSED] SPECIAL VERDICT AND  
INTERROGATORIES TO THE JURY**

We, the jury, unanimously find as follows:

**INFRINGEMENT OF POWER INTEGRATIONS' '876 PATENT**

**Infringement of the '876 Patent**

1. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '876 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1: YES \_\_\_\_\_ NO \_\_\_\_\_

2. If you answered "NO" as to any claim(s) in question 1, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1: YES \_\_\_\_\_ NO \_\_\_\_\_

**Willful Infringement of the '876 Patent**

3. If you answered "YES" as to any claims for any of questions 1-2, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES \_\_\_\_\_ NO \_\_\_\_\_

**INFRINGEMENT OF POWER INTEGRATIONS' '851 PATENT**

**Infringement of the '851 Patent**

4. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '851 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1: YES \_\_\_\_\_ NO \_\_\_\_\_

Claim 4: YES \_\_\_\_\_ NO \_\_\_\_\_

5. If you answered "NO" as to any claim(s) in question 4, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1: YES \_\_\_\_\_ NO \_\_\_\_\_

Claim 4: YES \_\_\_\_\_ NO \_\_\_\_\_

**Willful Infringement of the '851 Patent**

6. If you answered "YES" as to any claims for any of questions 4-5, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES \_\_\_\_\_ NO \_\_\_\_\_

**INFRINGEMENT OF POWER INTEGRATIONS' '366 PATENT**

**Infringement of the '366 Patent**

7. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '366 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 9: YES \_\_\_\_\_ NO \_\_\_\_\_

Claim 14: YES \_\_\_\_\_ NO \_\_\_\_\_

8. If you answered "NO" as to any claim(s) in question 7, do you find by a preponderance of the evidence that Fairchild nevertheless infringes the claim(s) under the doctrine of equivalents? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 9: YES \_\_\_\_\_ NO \_\_\_\_\_

Claim 14: YES \_\_\_\_\_ NO \_\_\_\_\_

**Willful Infringement of the '366 Patent**

9. If you answered "YES" as to any claims for any of questions 7-8, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES \_\_\_\_\_ NO \_\_\_\_\_

**INFRINGEMENT OF POWER INTEGRATIONS' '075 PATENT**

**Infringement of the '075 Patent**

10. Do you find by a preponderance of the evidence that Fairchild has literally infringed the following claims of the '075 Patent? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

Claim 1: YES \_\_\_\_\_ NO \_\_\_\_\_

Claim 5: YES \_\_\_\_\_ NO \_\_\_\_\_

**Willful Infringement of the '075 Patent**

11. If you answered "YES" as to any claims for question 10, do you find by clear and convincing evidence that Fairchild's infringement of the claim(s) was willful? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES \_\_\_\_\_ NO \_\_\_\_\_

**DAMAGES DUE TO POWER INTEGRATIONS**

**Damages for Infringement of the '876, '851, '366, and/or '075 Patents**

12. If you have found that Fairchild has infringed at least one asserted claim from any of the '876, '851, '366, and/or '075 Patents, do you find by a preponderance of the evidence that Power Integrations suffered actual damages as a result of Fairchild's infringement? (A "YES" answer to this question is a finding for Power Integrations. A "NO" answer is a finding for Fairchild.)

YES \_\_\_\_\_ NO \_\_\_\_\_

13. If you answered "YES" to question 12, state the type and amount of damages you find Power Integrations to have proven by a preponderance of the evidence:

(A) Lost Profits from Lost Sales ('876 and/or '851 patent only):

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(B) Past Lost Profits from Price Erosion: \_\_\_\_\_

(C) Future Lost Profits from Price Erosion: \_\_\_\_\_

(D1) Reasonable Royalty (in addition to Lost Profits from Lost Sales):

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(or)

(D2) Reasonable Royalty (if no Lost Profits from Lost Sales):

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**TOTAL DAMAGES** \_\_\_\_\_

14. If you answered “YES” to question 12, please state the applicable royalty rates that should apply to each patent you found Fairchild infringed:

‘876 Patent \_\_\_\_\_

‘851 Patent \_\_\_\_\_

‘366 Patent \_\_\_\_\_

‘075 Patent \_\_\_\_\_

You must each sign this Verdict Form: Dated: \_\_\_\_\_

\_\_\_\_\_ (foreperson) \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2006, I electronically filed a Power Integrations [Proposed] Special Verdict and Interrogatories to the Jury with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

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Attorneys for Defendants-  
Counterclaimants FAIRCHILD  
SEMICONDUCTOR  
INTERNATIONAL, INC., a Delaware  
corporation, and FAIRCHILD  
SEMICONDUCTOR CORPORATION

I hereby certify that on October 5, 2006, I have served via email, the document(s) to the following non-registered participants:

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corporation, and FAIRCHILD  
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*/s/ William J. Marsden, Jr.*

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William J. Marsden, Jr.